# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

VANGUARD IDENTIFICATION SYSTEMS,	:
INC.,	:
Plaintiff,	: CIVIL ACTION NO. : 02-CV-02943 (JPF)
v.	: :
RONNIE E. GOADE, SR., et al.,	: :
Defendants.	: :
	:
	:
	<u>.</u> :
<u>ORDER</u>	
AND NOW, this day of	, 2004, upon consideration of Movant's
Unopposed Motion for Admission of William E. Lohnes <i>Pro Hac Vice</i> , it is hereby <b>ORDERED</b>	
<b>AND DECREED</b> that William E. Lohnes is admitted <i>pro hac vice</i> in this action as counsel for	
defendants REG Oklahoma Acquisitions, LLC, Ronnie E. Goade, Sr., The Ronnie E. Goade, Sr.	
Revocable Trust, Renise Goade Lee, Ron E. Goade, Jr., Sean Goade, and Susan M. Goade.	

FULLAM, J.

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

VANGUARD IDENTIFICATION SYSTEMS,

INC.,

Plaintiff,

CIVIL ACTION NO. 02-CV-02943 (JPF)

v.

RONNIE E. GOADE, SR., et al.,

Defendants.

#### UNOPPOSED MOTION FOR ADMISSION PRO HAC VICE OF WILLIAM E. LOHNES

- 1. A. Richard Feldman, Esquire, a member of the Bar of this Court, and counsel for REG Oklahoma Acquisitions, LLC, Ronnie E. Goade, Sr., The Ronnie E. Goade, Sr. Revocable Trust, Renise Goade Lee, Ron E. Goade, Jr., Sean Goade, and Susan M. Goade ("Defendants"), in the above captioned matter, hereby moves for the admission *pro hac vice* of William E. Lohnes, associate of the law firm of Edwards & Angell, LLC, 90 State House Square, 9<sup>th</sup> Floor, Hartford, Connecticut 06103, as counsel for the Defendants in the above-captioned matter. In support of this Unopposed Motion, the declaration of A. Richard Feldman is attached hereto as Exhibit A.
- Counsel for Plaintiff has stated that Plaintiff does not oppose the granting of this
  Motion.

WHEREFORE, Defendants respectfully request this Court to enter an Order admitting William E. Lohnes, Esquire *pro hac vice* to the United Stated District Court for the Eastern District of Pennsylvania.

A. Richard Feldman, Esq. Identification No. 41329 BAZELON LESS & FELDMAN, P.C. 1515 Market Street, Suite 700 Philadelphia, PA 19102 215-568-1155 (voice) 215-568-9319 (fax)

Dated: September 10, 2004

### **EXHIBIT A**

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

VANGUARD IDENTIFICATION SYSTEMS, INC., Plaintiff,

CIVIL ACTION NO. 02-CV-02943 (JPF)

v.

RONNIE E. GOADE, SR., et al.,

Defendants.

DECLARATION IN SUPPPORT OF UNOPPOSED MOTION FOR ADMISSION PRO HAC VICE OF WILLIAM E. LOHNES

A. Richard Feldman, in support of Defendants' Unopposed Motion for Admission *Pro Hac Vice* of William E. Lohnes, deposes and says as follows:

- I am a member in good standing of the Bar of this Court and local counsel for Defendants.
- 2. Counsel for Defendants William E. Lohnes is a member in good standing of the Bar of the State of Connecticut and the Bar of the State of New York, with no disciplinary or grievance proceedings filed or pending against him, and he has not resigned or been denied admission, reprimanded, suspended or disbarred from the practice of law by this or any other court. William E. Lohnes is admitted to practice before the United States District Courts for the Southern District of New York, and the District of Connecticut.
- 3. Admission of William E. Lohnes *pro hac vice* in this action, on behalf of the Defendants, will facilitate presentation of the issues for adjudication by the Court. Mr. Lohnes has acquired special knowledge with respect to the claims made by the Defendants.

- 4. If admitted *pro hac vice*, William E. Lohnes will abide by all the rules of this Court, copies of which have been provided to him. I will also be able to provide any assistance regarding the rules and operating procedures of this Court.
- 5. I have spoken with David J. Perlman, counsel for Plaintiff, and confirmed that Plaintiff does not oppose the granting of this Motion.

Respectfully Submitted,

A. Richard Feldman, Esquire Identification No. 41329 BAZELON LESS & FELDMAN, P.C. 1515 Market Street, Suite 700 Philadelphia, PA 19102 215-568-1155 (voice) 215-568-9319 (fax)

Dated: September 10, 2004

### **CERTIFICATE OF SERVICE**

I, Michael A. Shapiro, hereby certify that on September 10, 2004, a true and correct copy of Defendants' Unopposed Motion for Admission Pro Hac Vice of William E. Lohnes was served via hand delivery, upon:

David J. Perlman Bochetto & Lentz, P.C. 1524 Locust Street Philadelphia, PA 19102

Michael A. Shapiro